

1 KELLY ARMSTRONG, ESQ. (SBN 213036)  
2 MATTHEW J. WAYNE, ESQ. (SBN 283897)  
3 **THE ARMSTRONG LAW FIRM**  
4 A Professional Corporation  
5 302 Caledonia Street, Suite 4  
6 Sausalito, California 94956  
7 Telephone (415) 331-4400  
8 Facsimile (415) 331-4407  
9 kelly@thearmstronglawfirm.com  
10 mwayne@thearmstronglawfirm.com

11 Attorneys for Plaintiff EUNICE NEELEY

12 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **IN AND FOR THE COUNTY OF SAN FRANCISCO**

14 EUNICE NEELEY, an individual,

15 Plaintiff,

16 v.

17 REGENTS OF THE UNIVERSITY OF  
18 CALIFORNIA, a public entity; STANTON  
19 GLANTZ, an individual; and DOES 1-50,  
20 inclusive;

21 Defendants.

) Case No. CGC-17-562891

) UNLIMITED JURISDICTION

) **COMPLAINT FOR DAMAGES**

- 22 (1) HOSTILE WORK  
23 ENVIRONMENT – SEXUAL  
24 HARASSMENT – FEHA;  
25 (2) RETALIATION – FEHA;  
26 (3) FAILURE TO PREVENT  
27 HARASSMENT AND  
28 RETALIATION – FEHA;  
(4) NEGLIGENT RETENTION OF AN  
UNFIT EMPLOYEE;  
(5) BREACH OF CONTRACT;  
(6) UNJUST ENRICHMENT;  
(7) COMPLAINT FOR  
PRELIMINARY AND  
PERMANENT INJUNCTIVE  
RELIEF; and  
(8) COMPLAINT FOR  
DECLARATORY RELIEF.

) **JURY TRIAL DEMANDED**  
) **PUNITIVE DAMAGES SOUGHT**

1  
2 **INTRODUCTION**

3 1. This is an action for damages brought by Plaintiff EUNICE NEELEY  
4 (hereinafter “NEELEY” or “PLAINTIFF”) against Defendants THE REGENTS OF THE  
5 UNIVERSITY OF CALIFORNIA (hereinafter “REGENTS” or “DEFENDANT”), STANTON  
6 GLANTZ (hereinafter “GLANTZ” or “DEFENDANT”), and DOES 1-50 (referred to  
7 collectively within parts of this Complaint as “DEFENDANTS”). NEELEY asserts causes of  
8 action as to: (1) Hostile Work Environment – Harassment Based on Sex – FEHA; (2)  
9 Retaliation – FEHA; (3) Failure to Prevent Harassment and Retaliation – FEHA; (4) Negligent  
10 Retention of an Unfit Employee; (5) Breach of Contract; (6) Unjust Enrichment; (7) Complaint  
11 for Preliminary and Permanent Injunctive Relief; and (8) Complaint for Declaratory Relief.

12 2. NEELEY’s claims for damages and injunctive and declaratory relief arise from  
13 DEFENDANTS’ actions while she was employed at the University of California, San Francisco  
14 (hereinafter “UCSF”) as a post-doctoral researcher with the Center for Tobacco Research and  
15 Education, working directly under GLANTZ.

16 3. Sexual harassment is contrary to public policy of the State of California, and  
17 although it is unlawful, it persists in employment across all levels of socioeconomic status. As  
18 the recent scandals involving Roger Ailes, Bill O’Reilly, and Harvey Weinstein show that the  
19 most powerful, well-educated, well-connected men feel entitled and protected to openly harass  
20 and degrade women in a sexual manner, to satisfy unchecked appetites for lust or domination.  
21 Every institution in our society is at risk for unabated sexual harassment to occur, and the  
22 University of California system is no exception. To be sure, the numerous victims of sex and  
23 gender-based harassment within the University of California system who have come forward  
24 confirm that that the U.C. system as a whole perpetuates a sexist scheme whereby people who  
25 hold powerful positions or who are perceived to be academic stars are treated differently than  
26 others on campus, and their positions are protected to advance the academic prestige of the  
27 university at the expense of students and employees who are harassed and discriminated against.

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1           13.    On multiple occasions, including in November of 2016, GLANTZ asked  
2 NEELEY for a hug, which made her uncomfortable. She did not want to engage in a hug and  
3 felt forced to agree to the hugs because of GLANTZ’s position as her supervisor.

4           14.    GLANTZ made inappropriate sex-related remarks in the workplace. When  
5 discussing research bias with NEELEY, he used the example of people responding to a survey  
6 by Playboy magazine, and said that respondents would exaggerate their sex lives, so data would  
7 be skewed. He used this inappropriate metaphor with NEELEY on more than one occasion.

8           15.    On another occasion, GLANTZ used coitus as a metaphor for a scientific  
9 phenomenon. GLANTZ used one of his hands to represent a penis and the other hand to  
10 represent a vagina, and put one hand into the other hand, to make a visual demonstration of this  
11 metaphor. There was no reason to mention coitus, and especially no reason to make a physical  
12 demonstration, and this made NEELEY uncomfortable.

13           16.    GLANTZ described to NEELEY, in detail, another woman’s sexual partners and  
14 reproductive history, even though it had nothing to do with their jobs. This woman was not a  
15 coworker and had no professional connection to their work. NEELEY did not care for this  
16 woman as a patient and had no reason to know or want to know about her sexual practices.  
17 GLANTZ described that he did not know how this woman was not pregnant, implying that he  
18 knew she had a large number of sexual partners. NEELEY was appalled by these remarks.

19           17.    In November or December 2016, when GLANTZ and NEELEY were alone  
20 together in a room with dimmed lights, he described an orgy scene from a Hollywood movie  
21 that GLANTZ assumed she had watched because the main characters were African-Americans,  
22 although NEELEY had never seen the movie. This was unwelcome and made NEELEY  
23 uncomfortable.

24           18.    NEELEY learned that GLANTZ believes he can do anything because he has  
25 tenure. She learned that he told multiple students that having tenure means “you can rape the  
26 Vice Chancellor’s daughter and still have a job.”

27           19.    During her employment, GLANTZ offered NEELEY lead authorship credit for a  
28 research paper if she agreed to research and write a paper based primarily on the tobacco

1 industry's "Total Exposure Study" (TES). NEELEY accepted GLANTZ's offer and researched  
2 and wrote the paper, which identifies misrepresentations by the tobacco industry (that low-tar  
3 cigarettes are less harmful) and outlines a strategy for ending the tobacco health crisis (that the  
4 FDA mandate cigarettes have nicotine levels low enough not to be addictive, which TES data  
5 suggests would eliminate many tobacco-caused diseases caused by cigarettes). This paper (the  
6 "TES Paper") was primarily authored by NEELEY and she finished the paper in May 2017.

7 20. In January 2017, GLANTZ asked two non-African American employees, Anne-  
8 Berit Petersen and Lauren Lempert, to double-check NEELEY's references in the TES Paper.  
9 Non-African American post-doctoral researchers' papers were not subject to the same scrutiny.  
10 GLANTZ justified his actions saying he wanted the TES Paper to be fool-proof, although  
11 neither woman had the medical expertise to fully fact check the paper.

12 21. Also in January 2017, NEELEY read one of Lempert's papers, and found it to  
13 contain inaccuracies. NEELEY gave the paper to a coworker, Juliette Jackson, to review.  
14 Jackson is partially of Native American descent and she identified inaccurate, culturally-  
15 insensitive statements in the paper regarding Native Americans. When this was conveyed to  
16 GLANTZ, he told Jackson in a condescending manner that he only hired her because of her  
17 Native American ancestry. These interactions and other interactions led NEELEY to believe  
18 that GLANTZ treated her and Jackson differently because they were racial minorities.

19 22. In March 2017, Jackson told NEELEY that GLANTZ constantly stared at her  
20 breasts. NEELEY and Jackson asked other women in the workplace whether GLANTZ was  
21 staring at their breasts, and many responded in the affirmative. Some of the women disclosed  
22 that GLANTZ made sexually inappropriate comments to them. One of the women disclosed she  
23 attended therapy because of GLANTZ's emotional abuse. Around this time, NEELEY sent an  
24 email to Pam Ling, her direct supervisor, complaining about GLANTZ's sexual harassment of  
25 her and requesting to be reassigned to a new mentor, Dorie Apollonio.

26 23. After GLANTZ formally stepped down as NEELEY's advisor and mentor,  
27 GLANTZ insisted on maintaining contact with her. In late March 2017, GLANTZ purposefully  
28 approached NEELEY at her desk after she repeatedly told him to leave her alone. GLANTZ

1 continued to advise her regarding the TES Paper and set “ground rules,” including that he  
2 reserved the right to be a coauthor of the paper or future papers that NEELEY wanted to  
3 complete, such as a paper examining how EEG technology could determine the nicotine  
4 threshold for a variety of tobacco products, including nicotine aerosols (e-cigarettes), and what  
5 the tobacco industry knew about the toxicity of nicotine.

6 24. In April 2017, GLANTZ lured NEELEY to complete the TES paper and told  
7 NEELEY that the TES Paper was in good shape and ready to submit. However, GLANTZ did  
8 not submit the paper. NEELEY continued to complain about the way minorities were treated in  
9 the program and GLANTZ’s sexually harassing behavior to other faculty members and UCSF  
10 OPHD where the director, Nyoki Sacramento, told NEELEY, “We will have GLANTZ email  
11 you, so he will not stare at your breasts,” instead of honoring that GLANTZ was no longer  
12 NEELEY’s mentor or supervisor.

13 25. Following her complaints, GLANTZ told NEELEY that he would be the senior  
14 and corresponding author of the TES Paper, contrary to his prior representations that GLANTZ  
15 would no longer be mentoring or advising NEELEY. GLANTZ also told NEELEY she needed  
16 to stay in contact with GLANTZ and answer his questions, and that Anne-Berit Petersen would  
17 be a coauthor of the paper (even though Anne-Berit Petersen provided similar advice as others  
18 who were not offered authorship and lacked the medical knowledge to fully interpret the TES  
19 data.).

20 26. Later in April 2017, at a birthday happy hour for a coworker, GLANTZ  
21 disclosed details of NEELEY’s complaints to other tobacco center members and boasted he had  
22 a team of lawyers working for him to fight against her complaint.

23 27. In April and May 2017, NEELEY complained that GLANTZ was scheming to  
24 remove her as an author on the TES Paper. She further complained that she should not have to  
25 directly interact with GLANTZ for the paper, given his history of sexually harassing her.  
26 NEELEY offered to communicate with GLANTZ via an intermediary. GLANTZ and UCSF  
27 continued to use the TES Paper as leverage to try to force her to interact with GLANTZ and  
28 threatened to remove her as an author.

1           28.     On or about May 9, 2017, UCSF gave GLANTZ formal notice that he was being  
2 investigated related to NEELEY's complaints.

3           29.     In May 2017, NEELEY was warned that GLANTZ intended to steal another  
4 paper of hers, the Nicotine Threshold Paper. NEELEY was told to deposit a copy of the paper  
5 with her union so there would be a written record that the paper was her idea.

6           30.     In negotiations with the staff union, GLANTZ took the position that NEELEY  
7 had to meet certain conditions, including communicating with GLANTZ directly, or her name  
8 could be removed from the papers as an author. NEELEY also had to agree with all of  
9 GLANTZ's ideas regarding the TES paper, even though GLANTZ lacked the medical  
10 background to write the TES paper and did not collect most of the data used for the TES paper.  
11 This amounted to a scheme to remove NEELEY's name from the list of authors.

12           31.     In late May or early June, GLANTZ followed through on his threats and  
13 submitted the TES Paper without NEELEY's name as an author. GLANTZ never received  
14 permission to omit NEELEY's name from the TES Paper and did not tell NEELEY that her  
15 paper was submitted. NEELEY had to find out through various mechanisms that GLANTZ  
16 submitted her work without crediting her.

17           32.     The International Committee of Medical Journal Editors (ICMJE) sets forth  
18 standards for authorship of scientific papers. Under the ICMJE standard, NEELEY should have  
19 been given credit as a named author. Further, Anne-Berit Petersen should not have been listed  
20 as an author, because her minimal feedback should not have warranted an authorship credit.  
21 NEELEY has no certainty that when the TES Paper is published, she will be listed as an author.  
22 Had she not complained about sexual harassment and asked for a new mentor, UCSF and  
23 GLANTZ would not have taken steps to strip her of authorship.

24           33.     NEELEY was forced to leave UCSF because her work environment was so  
25 intolerable and REGENTS and UCSF failed to take immediate and appropriate action to prevent  
26 GLANTZ's ongoing harassment and retaliation towards NEELEY.

27           34.     Based on the foregoing, NEELEY has suffered and continues to suffer  
28 significant emotional and physical distress.



1 **FIRST CAUSE OF ACTION**

2 **HOSTILE WORK ENVIRONMENT – SEXUAL HARASSMENT – FEHA**

3 **VIOLATION OF CAL. GOV. CODE §§ 12940 *et seq.***

4 **(AGAINST ALL DEFENDANTS AND DOES 1-50)**

5 35. PLAINTIFF incorporates by reference the previous factual allegations.

6 36. All the above conduct was unwelcome and was directed towards PLAINTIFF  
7 based on her sex. All the above conduct constitutes sexual harassment. All the above conduct  
8 was part of an ongoing and continuing pattern of conduct.

9 37. All the above conduct (including conduct directed at PLAINTIFF and conduct  
10 directed at others that PLAINTIFF became aware of by witnessing it directly or by hearing  
11 about it) caused PLAINTIFF to perceive her work environment as intimidating, hostile, abusive  
12 or offensive and created a hostile work environment based on her sex.

13 38. Complaints and/or information about much of the harassing conduct were made  
14 to DEFENDANTS. DEFENDANTS failed to conduct a prompt and thorough investigation into  
15 allegations of sexual harassment. After the complaints, the harassment continued in similar  
16 forms and resulted in new forms of harassment and discrimination.

17 39. DEFENDANTS' acts were malicious, oppressive or fraudulent with intent to  
18 vex, injure, annoy, humiliate and embarrass PLAINTIFF, and in conscious disregard of the  
19 rights or safety of PLAINTIFF and other employees of REGENTS, and in furtherance of  
20 REGENTS' ratification of the wrongful conduct of the managers of REGENTS including  
21 GLANTZ. Accordingly, PLAINTIFF is entitled to recover punitive damages from Defendant  
22 GLANTZ.

23 40. By reason of the conduct of DEFENDANTS and each of them as alleged herein,  
24 PLAINTIFF has necessarily retained attorneys to prosecute the within action. PLAINTIFF is  
25 therefore entitled to reasonable attorney's fees and litigation expenses, including expert witness  
26 fees and costs, incurred in bringing the within action. As a result of DEFENDANTS' and each  
27 of their actions, PLAINTIFF sustained economic damages to be proven at trial. As a further

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1 41. result of DEFENDANTS' and each of their actions, PLAINTIFF suffered  
2 emotional distress; resulting in damages to be proven at trial.

3 42. The above harassing and discriminatory conduct violates FEHA, Government  
4 Code §§ 12940 and 12941 and California Public Policy and entitles PLAINTIFF to all  
5 categories of damages, including exemplary or punitive damages against Defendant GLANTZ.

6 **SECOND CAUSE OF ACTION**

7 **RETALIATION UNDER THE FEHA**

8 **VIOLATION OF CAL. GOV. CODE §§ 12940 *et seq.***

9 **(AGAINST REGENTS AND DOES 1-50)**

10 43. PLAINTIFF incorporates by reference the previous factual allegations.

11 44. In violation of California Government Code § 12940, DEFENDANTS retaliated  
12 against PLAINTIFF for having opposed, resisted, and complained of the acts alleged herein.

13 45. Within a short time after PLAINTIFF complained regarding unlawful  
14 harassment, discrimination, and retaliation, DEFENDANTS retaliated against PLAINTIFFS by  
15 changing the conditions of her employment, taking steps to force her to have continued,  
16 unnecessary interactions with her harasser, taking steps to prevent her from getting credit for  
17 her paper as an author, taking steps to give credit on her paper to other UCSF employees who  
18 were not its authors, and other unlawful acts of retaliation, causing PLAINTIFF emotional  
19 distress.

20 46. DEFENDANTS' acts were malicious, oppressive or fraudulent with intent to  
21 vex, injure, annoy, humiliate and embarrass PLAINTIFF, and in conscious disregard of the  
22 rights or safety of PLAINTIFF and other employees of REGENTS, and in furtherance of  
23 REGENTS' ratification of the wrongful conduct of the managers of REGENTS including  
24 GLANTZ. Accordingly, PLAINTIFF is entitled to recover punitive damages from Defendant  
25 GLANTZ.

26 47. By reason of the conduct of DEFENDANTS and each of them as alleged herein,  
27 PLAINTIFF has necessarily retained attorneys to prosecute the within action. PLAINTIFF is  
28 therefore entitled to reasonable attorney's fees and litigation expenses, including expert witness

1 fees and costs, incurred in bringing the within action. As a result of DEFENDANTS' and each  
2 of their actions, PLAINTIFF sustained economic damages to be proven at trial. As a further  
3 result of DEFENDANTS' and each of their actions, PLAINTIFF suffered emotional distress;  
4 resulting in damages to be proven at trial.

5 48. The above harassing and discriminatory conduct violates FEHA, Government  
6 Code §§ 12940 and 12941 and California Public Policy and entitles PLAINTIFF to all  
7 categories of damages, including exemplary or punitive damages against Defendant GLANTZ.

8 **THIRD CAUSE OF ACTION**

9 **FAILURE TO PREVENT HARASSMENT AND RETALIATION– FEHA**

10 **VIOLATION OF CAL. GOV. CODE §§ 12940 *et seq.***

11 **(AGAINST REGENTS AND DOES 1-50)**

12 49. PLAINTIFF incorporates by reference the previous factual allegations.

13 50. In violation of the FEHA, DEFENDANTS failed to take all reasonable steps  
14 necessary to prevent sexual harassment and retaliation against PLAINTIFF.

15 51. In perpetrating the above-described conduct, DEFENDANTS engaged in a  
16 pattern, practice, policy, and custom of unlawful sexual harassment and retaliation. This  
17 constituted a policy, practice, tradition, custom, and usage which denied PLAINTIFF  
18 protections afforded by FEHA.

19 52. During all relevant times, DEFENDANTS failed to make an adequate response  
20 and investigation into sexual harassment and retaliation. This constituted a policy, custom,  
21 practice or usage within DEFENDANTS that condoned, encouraged, tolerated, sanctioned,  
22 ratified, approved of, and acquiesced in unlawful sexual harassment and retaliation towards  
23 DEFENDANTS' employees including, but not limited to, PLAINTIFF.

24 53. During all relevant times, there existed within DEFENDANTS a pattern and  
25 practice of conduct by their personnel which resulted in sexual harassment and retaliation,  
26 including but not necessarily limited to, conduct directed at PLAINTIFF.

27 54. Upon information and belief, DEFENDANTS did not provide adequate  
28 harassment training or retaliation training with respect to their employees and managers.

1           55.     DEFENDANTS knew or reasonably should have known that the failure to  
2 provide any or adequate education, training, and information as to their personnel policies and  
3 practices regarding sexual harassment or retaliation would result in unlawful conduct.

4           56.     The failure of DEFENDANTS to provide any or adequate education, training,  
5 and information to personnel concerning policies and practices regarding sexual harassment and  
6 retaliation for complaining of or resisting the same, constituted deliberate indifference to the  
7 rights of employees, including but not limited to, PLAINTIFF.

8           57.     PLAINTIFF filed a timely complaint against DEFENDANTS with the DFEH  
9 alleging, among others, failure to prevent sex and race harassment, sexual harassment,  
10 discrimination, and retaliation. Thereafter, PLAINTIFF received from the DFEH notification of  
11 her right to sue DEFENDANTS.

12           58.     DEFENDANTS' acts were malicious, oppressive or fraudulent with intent to  
13 vex, injure, annoy, humiliate and embarrass PLAINTIFF, and in conscious disregard of the  
14 rights or safety of PLAINTIFF and other employees of REGENTS, and in furtherance of  
15 REGENTS' ratification of the wrongful conduct of the managers of REGENTS including  
16 GLANTZ. Accordingly, PLAINTIFF is entitled to recover punitive damages from Defendant  
17 GLANTZ.

18           59.     By reason of the conduct of DEFENDANTS and each of them as alleged herein,  
19 PLAINTIFF has necessarily retained attorneys to prosecute the within action. PLAINTIFF is  
20 therefore entitled to reasonable attorney's fees and litigation expenses, including expert witness  
21 fees and costs, incurred in bringing the within action. As a result of DEFENDANTS' and each  
22 of their actions, PLAINTIFF sustained economic damages to be proven at trial. As a further  
23 result of DEFENDANTS' and each of their actions, PLAINTIFF suffered emotional distress;  
24 resulting in damages to be proven at trial.

25           60.     The above harassing and discriminatory conduct violates FEHA, Government  
26 Code §§ 12940 and 12941 and California Public Policy and entitles PLAINTIFF to all  
27 categories of damages, including exemplary or punitive damages against Defendant GLANTZ.

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1 **FOURTH CAUSE OF ACTION**

2 **NEGLIGENT RETENTION OF AN UNFIT EMPLOYEE**

3 **(AGAINST REGENTS AND DOES 1-50)**

4 61. PLAINTIFF incorporates by reference the previous factual allegations.

5 62. PLAINTIFF is informed and believes and thereon alleges that REGENTS, by  
6 and through its principals, agents and employees, conducted itself unlawfully in violation of  
7 applicable law as described above with conscious disregard of the result or outcome of such  
8 conduct.

9 63. At all times, REGENTS owed PLAINTIFF the duties to properly and adequately  
10 hire, investigate, train, supervise, monitor and discipline its employees, as well as to make,  
11 enforce and act in compliance with policies that are lawful and protective of its employees'  
12 rights and safety.

13 64. REGENTS negligently and carelessly hired and retained its employees including,  
14 but not limited to, GLANTZ. REGENTS breached its duty to exercise reasonable care and acted  
15 negligently and carelessly in the retention of GLANTZ by failing to monitor, supervise and  
16 investigate the conduct of GLANTZ, and by failing to adequately reprimand and limit his  
17 harassing and retaliatory behavior.

18 65. As a direct and proximate result of REGENTS' willful, knowing and intentional  
19 conduct, PLAINTIFF has sustained, and continues to sustain economic and non-economic  
20 damages including loss of earnings, emotional distress, and other damages.

21 **FIFTH CAUSE OF ACTION**

22 **BREACH OF CONTRACT**

23 **(AGAINST ALL DEFENDANTS AND DOES 1-50)**

24 66. PLAINTIFF incorporates by reference the previous factual allegations.

25 67. PLAINTIFF and DEFENDANTS entered into an express or implied contract  
26 regarding PLAINTIFF's research and writing of the TES Paper. DEFENDANTS' obligation  
27 under the contract was to list PLAINTIFF as the lead author of the TES Paper.

28 68. PLAINTIFF performed all her obligations under the contract.



1 **EIGHTH CAUSE OF ACTION**

2 **COMPLAINT FOR DECLARATORY RELIEF**

3 **(AGAINST ALL DEFENDANTS AND DOES 1-50)**

4 79. PLAINTIFF incorporates by reference the previous factual allegations.

5 80. An actual controversy has arisen and now exists between PLAINTIFF and  
6 DEFENDANTS concerning their respective rights and duties in that PLAINTIFF contends she  
7 should be identified as the lead author of the TES Paper and DEFENDANTS dispute this  
8 contention.

9 81. PLAINTIFF desires a judicial determination of the parties' rights and duties as  
10 to the publication of the TES Paper, and a declaration that PLAINTIFF should be identified as  
11 the lead author of the TES Paper.

12 82. A judicial declaration is necessary and appropriate at this time under the  
13 circumstances so PLAINTIFF may ascertain the parties' rights and duties as to the publication  
14 of the TES Paper.

15 **PRAYER FOR RELIEF**

16 WHEREFORE, PLAINTIFF prays for relief as follows:

- 17 1. For general damages according to proof, however, no less than the jurisdictional  
18 limit of this court;
- 19 2. For special damages according to proof, including past and future lost wages;
- 20 3. For exemplary and punitive damages in amounts according to proof;
- 21 4. For an order requiring DEFENDANTS to show cause why they should not be  
22 enjoined as set forth in this complaint, during the pendency of this action;
- 23 5. For a preliminary and permanent injunction enjoining DEFENDANTS and their  
24 agents, servants, and employees, and all persons acting under, in concert with, or  
25 for them, from removing PLAINTIFF's name from the TES Paper;
- 26 6. For a preliminary and permanent injunction requiring DEFENDANTS and their  
27 agents, servants, and employees, and all persons acting under, in concert with, or  
28 for them, to list PLAINTIFF as the lead author of the TES Paper;

- 1 7. For a declaratory judgment that PLAINTIFF is the lead author of the TES Paper  
2 and that DEFENDANTS and their agents, servants, and employees, and all  
3 persons acting under, in concert with, or for them, shall list PLAINTIFF as the  
4 lead author of the TES Paper;
- 5 8. For other declaratory relief as provided by law, including, *inter alia*, that  
6 DEFENDANTS' actions against PLAINTIFF violated Government Code section  
7 12940, *et seq.*, and all other statutes alleged herein and that DEFENDANTS'  
8 defamatory statements are false;
- 9 9. For interest as provided by law;
- 10 10. For cost of suit incurred herein;
- 11 11. For attorneys' fees as provided by law; and
- 12 12. For such other and further relief as the Court deems fair and just.

13  
14 Dated: December 6, 2017

THE ARMSTRONG LAW FIRM



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KELLY ARMSTRONG  
MATTHEW J. WAYNE  
Attorneys for Plaintiff

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21 **JURY DEMAND**

22 PLAINTIFF demand a trial by jury.

23  
24 Dated: December 6, 2017

THE ARMSTRONG LAW FIRM



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KELLY ARMSTRONG  
MATTHEW J. WAYNE  
Attorneys for Plaintiff